



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 2, 2022

By ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Open Society Justice Institute v. DoD et al.*, No. 20 Civ. 5096 (JMF)
Open Society Justice Institute v. HHS et al., No. 20 Civ. 6359 (JMF)
(Consolidated)

Dear Judge Furman:

This Office represents the fourteen defendant Government agencies in this consolidated matter brought by Plaintiff Open Society Justice Institute under the Freedom of Information Act (“FOIA”) seeking records related to COVID-19. We write respectfully on behalf of the parties to submit the following status report pursuant to the parties’ stipulation and order entered by the Court on December 3, 2020. (*See* Dkt. Nos. 62, 69).

At present, there are no changed circumstances currently affecting the processing rates set forth in the Court’s orders for each of the Defendant agencies. (*See* Dkt. Nos. 62, 69, 95). In addition, the conditions described in the Defendant agencies’ previous declarations remain largely in effect. (*See* Dkt. 58). As previously reported, U.S. Indo-Pacific Command, the Federal Emergency Management Agency, the Defense Intelligence Agency, and the Centers for Disease Control have completed their internal processing of records potentially responsive to the FOIA requests at issue. The remaining Defendant agencies continue to process Plaintiff’s FOIA requests pursuant to the terms ordered by the Court (*see* Dkt. Nos. 62, 69, 95).

The parties thank the Court for its consideration of this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

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